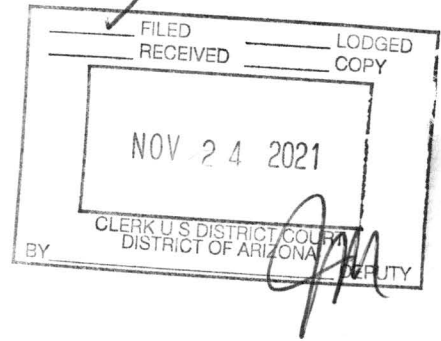


GARY M. RESTAINO  
United States Attorney  
District of Arizona  
MICHAEL R. LIZANO  
CRAIG H. RUSSELL  
Assistant U.S. Attorneys  
United States Courthouse  
405 W. Congress Street, Suite 4800  
Tucson, Arizona 85701  
Telephone: 520-620-7300  
Email: michael.perez-lizano@usdoj.gov  
Email: craig.russell@usdoj.gov  
Attorneys for Plaintiff



IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
  
Plaintiff,  
  
vs.  
  
[Redacted Defendant], et al.,  
  
Defendants.

CR 21-02715-JAS(LCK)

GOVERNMENT'S MOTION  
TO UNSEAL CASE, FILE REDACTED  
INDICTMENT, MAKE PUBLIC THE  
NAME OF DEFENDANT #2, AND  
MAINTAIN NAME OF REDACTED  
DEFENDANT UNDER SEAL

(Paper Filed In A Sealed Case; Certain  
Defendant Name(s) to Remain Redacted)

The United States of America, by and through its undersigned attorneys, respectfully requests that, to balance the need for public filing of documents relating to the arrested defendant against the need to maintain the name of a fugitive under seal, that this Court enter an Order to:

1. Unseal the case.
2. Make public the name of Jesus TORRES-Aguilera, Defendant #2.
3. File in the Court Docket the attached redacted indictment, which reveals the name of the defendant who may be made public and redacts the name of the defendant who remains a fugitive. (Attachment A.)
4. Maintain the name of the redacted defendant under seal by referring to him/her as "REDACTED DEFENDANT" in the public record.

1           5.     Authorize the Clerk, after the arrest of the redacted defendant, to publicly  
2 docket pleadings using the defendant's actual name. The government will, as soon as  
3 practicable after the arrest of the redacted defendant, move to unseal that defendant's  
4 name and move to unseal the original indictment or file a redacted indictment revealing  
5 the defendant's name.

6           6.     It is the intent of the undersigned counsel to unseal the entire case except  
7 for the redacted defendant referred to above, and the following specific documents: the  
8 Unredacted Indictment [Doc. 3], the Motion to Seal Indictment [Doc. 1], the Order to  
9 Seal Indictment [Doc. 2], and the Sealed Unredacted Indictment [Doc. 7].

10          7.     Pursuant to the March 2004 Judicial Conference guidance, certain criminal  
11 documents shall not be included in the public case file and should not be made available  
12 to the public at the courthouse or via remote electronic access: unexecuted summonses or  
13 warrants of any kind (e.g., search warrants, arrest warrants); pretrial bail or presentence  
14 investigation reports; statements of reasons in the judgment of conviction; juvenile  
15 records; documents containing identifying information about jurors or potential jurors;  
16 financial affidavits filed in seeking representation pursuant to the Criminal Justice Act; *ex*  
17 *parte* requests for authorization of investigative expenses, and expert or other services  
18 pursuant to the Criminal Justice Act. Accordingly, the government requests that  
19 documents in those categories remain sealed without further order of the Court.

20          8.     The government further requests authorization to disclose the name(s) of  
21 any redacted defendant(s), and any indictments that disclose these names, as necessary

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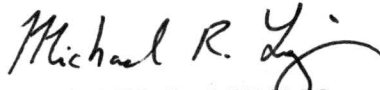
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1 for law enforcement purposes, to further the prosecution of the case, and when filing any  
2 motion(s) to make public the names of redacted defendant(s).

3 Respectfully submitted this 24th day of November, 2021.

4  
5 GARY M. RESTAINO  
United States Attorney  
District of Arizona

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7   
8 MICHAEL R. LIZANO  
CRAIG H. RUSSELL  
9 Assistant U.S. Attorneys